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November 18, 2022

VIA ECF

The Honorable George B. Daniels
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, No. 03-md-1570-GBD-SN
Participation of Congressional Amici

Dear Judge Daniels:

We are writing in connection with Magistrate Judge Netburn's August 26, 2022, Report & Recommendation, ECF No. 8463, which recommended the denial of turnover motions filed by four groups of judgment creditors of the Taliban pursuant to the Terrorism Risk Insurance Act of 2002 ("TRIA"), and in connection with the judgment creditors' November 10, 2022, objections thereto, ECF No. 8733, which offered a different view concerning the applicability of TRIA.

Our law firm, Osen LLC, has been in contact with several former members of Congress who either authored or co-sponsored TRIA. The members of Congress are considering whether to submit a brief as *amici curiae* concerning the differing interpretations of that statute put forward by the Report & Recommendation and the objections of the judgment creditors. In the coming weeks we anticipate filing a motion for leave to submit an *amicus* brief on behalf of those members of Congress, alongside the proposed brief itself.

We submit this letter to request that the Court enter a schedule by which the Congressional *amici* may file their anticipated motion and brief. We believe that a period of 45 days would allow sufficient time to complete the submission and to coordinate among the participating members of Congress as we enter the winter holiday season.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Michael J. Radine

cc: All Counsel